

OVED & OVED

ATTORNEYS

July 12, 2022

VIA ECF

Hon. James L. Cott
United States District Court
Southern District of New York
500 Pearl Street, Room 1360
New York, NY 10007

Re: Rosen v. Sapir et al., Case No. 1:20-cv-05844 (RA) (JLC)

Dear Magistrate Judge Cott:

This law firm represents Defendants/Counterclaimants Alex Sapir and 260-261 Madison Avenue Junior Mezzanine LLC in the above-referenced matter. We write pursuant to your order, dated May 13, 2022, directing the parties to provide a further update regarding their settlement efforts (ECF Doc. # 109).

Since our last update to Your Honor, on June 7, 2022, Surrogate Mella of the New York County Surrogate's Court granted summary judgment to Alex Sapir dismissing Plaintiff Rotem Rosen's \$103 Million claim in the related proceeding, captioned *In re Petition of Alex Sapir, as Preliminary Executor of the Estate of Tamir Sapir*, Case No. 2014-4683/A, which has significantly narrowed the scope of the parties' dispute. Surrogate Mella advised the parties that her written opinion would be forthcoming. Once the parties have received and reviewed Surrogate Mella's written opinion, they will be in a better position to evaluate an appropriate resolution of this action. Accordingly, with the Court's permission, we will update the Court again once Surrogate Mella's written opinion has been issued.

We thank the Court for its time and continued attention to this matter.

Respectfully submitted,

/s/ Andrew J. Urgenson

Andrew J. Urgenson

cc: All counsel of record (via ECF)